IN THE UNITED STATES BANKRUPTCY COURT FOR THE SOUTHERN DISTRICT OF TEXAS HOUSTON DIVISION

) Re: Docket No. 274
) Case No. 23-90054)
Wind-Down Debtor.	(Formerly Jointly Administered underLead Case IEH Auto Parts Holding LLC
AUTO PLUS AUTO SALES LLC,1) (Formarky Jointly Administered under
m ic.) Case No. 23-90055 (CML)
In re:) Chapter 11

CERTIFICATE OF COUNSEL REGARDING THE WIND-DOWN DEBTOR'S SEVENTH OMNIBUS OBJECTION TO CERTAIN PROOFS OF CLAIM (AMENDED CLAIMS, RECLASSIFIED CLAIMS, DUPLICATE CLAIM, AND PARTIALLY SATISFIED CLAIMS)

Pursuant to the *Procedures for Complex Chapter 11 Cases in the Southern District of Texas*, the undersigned counsel for the above-captioned wind down debtor (the "Wind-Down Debtor") certifies as follows:

- 1. On February 28, 2025, the Wind-Down Debtor filed the Wind-Down Debtors' Seventh Omnibus Objection to Certain Proofs of Claim (Amended Claims, Reclassified Claims, Duplicate Claim, and Partially Satisfied Claims) [Docket No. 274] (the "Objection").
- 2. The deadline for parties to file objections or responses to the Objection was March 31, 2025 (the "Response Deadline").
- 3. On March 28, 2025, the United States of America acting on behalf of the Internal Revenue Service ("IRS") filed its *Response of the United States of America to Debtor's Seventh Omnibus Objection to Certain Proofs of Claim* [Docket No. 320], stating that it agreed with the relief asserted in the Objection as to the IRS proof of claim.

The Wind-Down Debtor's service address is: 5330 Carmel Crest Lane, Charlotte, North Carolina 28226. All pleadings related to these chapter 11 cases may be obtained from the website of the Wind Down Debtor's claims and noticing agent at https://www.kccllc.net/autoplus.



4. On March 31, 2025, Michael D. Warner, solely in his capacity as trustee (the "GUC Trustee"), filed the GUC Trustee's Response and Reservation of Rights to Wind-Down Debtor's Objections to Non-GUC Claims [Docket No. 323] (the "GUC Trustee Response").

5. Counsel to the Wind-Down Debtor spoke with counsel to the GUC Trustee to resolve the GUC Trustee Response. No revisions were necessary to resolve the GUC Trustee Response. As such, undersigned counsel certifies that the attached proposed order resolves all known objections and formal responses received with regard to the claims referenced therein.

6. The Wind-Down Debtor requests that the Court enter the attached proposed order at the earliest convenience of the Court.

Houston, Texas

Dated: May 23, 2025

/s/ Emily Meraia

JACKSON WALKER LLP

Matthew D. Cavenaugh (TX Bar No. 24062656) Veronica A. Polnick (TX Bar No. 24079148) Zachary McKay (TX Bar No 24073600) Emily Meraia (TX Bar No. 24129307) 1401 McKinney Street, Suite 1900 Houston, TX 77010

Telephone: (713) 752-4200 Facsimile: (713) 752-4221

Email: mcavenaugh@jw.com

vpolnick@jw.com zmckay@jw.com emeraia@jw.com

Counsel to the Wind-Down Debtor

Certificate of Service

I certify that on May 23, 2025, I caused a copy of the foregoing document to be served by the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas.

/s/ Emily Meraia

Emily Meraia

IN THE UNITED STATES BANKRUPTCY COURT FOR THE SOUTHERN DISTRICT OF TEXAS HOUSTON DIVISION

) Chapter 11
In re:)
) Case No. 23-90055 (CML)
AUTO PLUS AUTO SALES LLC, ¹)
) (Formerly Jointly Administered under
Wind-Down Debtor.) Lead Case IEH Auto Parts Holding
) LLC, Case No. 23-90054)
) Re: Docket No. <u>274</u>

ORDER SUSTAINING THE WIND DOWN DEBTOR'S SEVENTH OMNIBUS OBJECTION TO CERTAIN PROOFS OF CLAIM (AMENDED CLAIMS, RECLASSIFIED CLAIMS, DUPLICATE CLAIM, AND PARTIALLY SATISFIED CLAIMS)

Upon the objection (the "Objection")² of the above-captioned Wind-Down Debtors, seeking entry of an order (the "Order") sustaining the Wind-Down Debtor's Seventh Omnibus Objection to Certain Proofs of Claim (Amended Claims, Reclassified Claims, Duplicate Claim, and Partially Satisfied Claims), all as more fully set forth in the Objection; and this Court having jurisdiction over this matter pursuant to 28 U.S.C. § 1334; and this Court having found that this is a core proceeding pursuant to 28 U.S.C. § 157(b); and this Court having found that it may enter a final order consistent with Article III of the United States Constitution; and this Court having found that venue of this proceeding and this Objection in this district is permissible pursuant to 28 U.S.C. §§ 1408 and 1409; and this Court having found that the relief requested in the Objection is in the best interests of the Wind-Down Debtors' estates, their creditors, and other parties in interest; and this Court having found that the Wind-Down Debtors' notice of the Objection and opportunity for

¹ The Wind-Down Debtor's service address is: 5330 Carmel Crest Lane, Charlotte, North Carolina 28226. All pleadings related to these chapter 11 cases may be obtained from the website of the Wind Down Debtor's claims and noticing agent at https://www.kccllc.net/autoplus.

² Capitalized terms used but not otherwise defined herein have the meanings ascribed to them in the Objection.

a hearing on the Objection were appropriate under the circumstances and no other notice need be provided; and this Court having reviewed the Objection; and this Court having determined that the legal and factual bases set forth in the Objection establish just cause for the relief granted herein; and upon all of the proceedings had before this Court; and after due deliberation and sufficient cause appearing therefor, it is HEREBY ORDERED THAT:

- 1. Each Amended Claim identified in the "Claims to be Disallowed" row on **Schedule 1** attached to this Order is disallowed; *provided* that this Order will not affect the Remaining Amended Claims identified on **Schedule 1** attached hereto.
- 2. Each Reclassified Claim identified on <u>Schedule 2</u> attached to this Order is modified and reclassified to the extent provided in the column titled "Modified Claim" on the <u>Schedule 2</u> attached hereto; *provided* that this Order does not Allow the Corrected Reclassified Claims identified on <u>Schedule 2</u>.
- 3. Each Duplicate Claim identified on <u>Schedule 3</u> attached to this Order is disallowed in its entirety and replaced by the applicable "Remaining Claim" identified on <u>Schedule 3</u>; *provided* that nothing herein affects the Remaining Duplicate Claim identified on <u>Schedule 3</u>.
- 4. Each Partially Satisfied Claim identified on <u>Schedule 4</u> attached to this Order is reduced to reflect the amount set forth in the column titled "Modified Claim" to the extent set forth on <u>Schedule 4</u> attached hereto; *provided* that this Order does not Allow the Corrected Partially Satisfied Claims.
- 5. Nothing in this Order affects the Wind-Down Debtor's and/or GUC Trustee's rights to object to any Surviving Claim on any applicable grounds.

- 6. Verita Global, as claims, noticing, and solicitation agent, is authorized and directed to update the claims register maintained in these chapter 11 cases to reflect the relief granted in this Order.
- 7. To the extent a response is filed regarding any Objected Claim, each such Objected Claim, and the Objection as it pertains to such Objected Claim, will constitute a separate contested matter as contemplated by Bankruptcy Rule 9014. This Order will be deemed a separate order with respect to each Objected Claim.
- 8. Notwithstanding the relief granted in this Order and any actions taken pursuant to such relief, nothing in this Order shall be deemed: (a) an admission as to the validity of any claim, including the Surviving Claims, against a Debtor entity; (b) a waiver of the Wind-Down Debtor's right to dispute any claim on any grounds; (c) a promise or requirement to pay any claim; (d) an implication or admission that any particular claim is of a type specified or defined in this Objection or any order granting the relief requested by this Objection; (e) a request or authorization to assume any agreement, contract, or lease pursuant to section 365 of the Bankruptcy Code; or (f) a waiver of the Wind-Down Debtor's rights under the Bankruptcy Code or any other applicable law.
- 9. Notwithstanding the relief granted in this Order and any actions taken pursuant to such relief, nothing in this Order shall prejudice to the rights of the Wind-Down Debtor or the GUC Trustee, as defined in the Plan, to object to any claim, including the Surviving Claims, on any grounds whatsoever. The Wind-Down Debtor specifically and expressly reserves for all purposes the GUC Trustee's right and ability to object to any and all general unsecured claims notwithstanding the relief granted in this Order, whether such claims are reclassified or otherwise modified under this Order, and this Order does not in any manner whatsoever inhibit, modify or otherwise limit the GUC Trustee's right to object to any general unsecured claim for any reason

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whatsoever, including without limitation to hereafter object to a general unsecured claim to the

extent (i) such claim should properly be classified as an administrative claim pursuant to Section

503(b)(9) or otherwise and (ii) such claim is reclassified from a Section 503(b)(9) claim to a

general unsecured claim pursuant to this Order. The Wind-Down Debtor's and/or Plan Agent's

beliefs and allegations with respect to any claims affected by the Objection or this Order, whether

general unsecured claims or otherwise, shall not be binding on or otherwise prejudice the Plan

Agent in any respect, irrespective of whether the GUC Trustee challenged those beliefs or

allegations as set forth in the Objection.

10. The Wind-Down Debtor is authorized to take all actions necessary to effectuate the

relief granted in this Order in accordance with the Objection.

11. This Order is immediately effective and enforceable upon its entry.

12. This Court retains exclusive jurisdiction with respect to all matters arising from or

related to the implementation, interpretation, and enforcement of this Order.

Dated: ______, 2025

CHRISTOPHER M. LOPEZ UNITED STATES BANKRUPTCY JUDGE

Amended Claims

Admin: \$

Auto Plus Auto Sales LLC

7th Omnibus Objection - Amended Claims Basis for Objection: See Paragraph 17

Name	Date Filed	Case Number / Debtor	Claim #	Claim	ed A	mounts
Claim to be Disallowed City of Fredericksburg, Virginia PO Box 267 Fredericksburg, VA 22404	2/27/2023	IEH Auto Parts Holding LLC 23-90054	71	Secured: Admin: Priority: Unsecured: Total:	\$ \$ \$	- 168.76 15.46 184.22
Remaining Claim City of Fredericksburg, Virginia PO Box 267 Fredericksburg, VA 22404	6/20/2023	IEH Auto Parts Holding LLC 23-90054	652	Secured: Admin: Priority: Unsecured: Total:	\$ \$ \$ \$ \$ \$	- 1,273.10 - 1,273.10
Claim to be Disallowed Department of Treasury - Internal Revenue Service P.O. Box 7346 Philadelphia, PA 19101-7346	3/9/2023	IEH Auto Parts LLC 23-90057	111	Secured: Admin: Priority: Unsecured: Total:	\$	140,760.95 - 140,760.95
Remaining Claim Department of Treasury - Internal Revenue Service P.O. Box 7346 Philadelphia, PA 19101-7346	9/24/2024	IEH Auto Parts LLC 23-90057	767	Secured: Admin: Priority: Unsecured: Total:	\$ \$ \$ \$ \$	22,000.00 - 22,000.00
Claim to be Disallowed Massachusetts Department of Revenue P.O. Box 7090 Boston, MA 02204-7090 Permaining Claim	6/15/2023	IEH Auto Parts LLC 23-90057	663	Secured: Admin: Priority: Unsecured: Total:	\$ \$	- 607,394.21 121,478.84 728,873.05
Remaining Claim Massachusetts Department of Revenue P.O. Box 7090 Boston, MA 02204-7090	7/17/2023	IEH Auto Parts LLC 23-90057	692	Secured: Admin: Priority: Unsecured: Total:	\$ \$ \$ \$ \$ \$	1,491,578.45 - 1,491,578.45
Claim to be Disallowed Massachusetts Department of Revenue P.O. Box 7090 Boston, MA 02204-7090	7/17/2023	IEH Auto Parts LLC 23-90057	692	Secured: Admin: Priority: Unsecured: Total:	\$	1,491,578.45 264,650.33 1,756,228.78
Claim to be Disallowed Massachusetts Department of Revenue P.O. Box 7090 Boston, MA 02204-7090	11/28/2023	IEH Auto Parts LLC 23-90057	750	Secured: Admin: Priority: Unsecured: Total:	\$ \$ \$ \$ \$	1,340,762.47 248,942.86 1,589,705.33
Remaining Claim Massachusetts Department of Revenue P.O. Box 7090 Boston, MA 02204-7090	6/6/2024	IEH Auto Parts LLC 23-90057	765	Secured: Admin: Priority: Unsecured: Total:	\$ \$ \$ \$ \$ \$	1,005,326.37 174,204.29 1,179,530.66
Claim to be Disallowed New York State Department of Taxation & Finance PO Box 5300 Albany, NY 12205	2/21/2023	IEH BA LLC 23-90059	50	Secured: Admin: Priority: Unsecured: Total:	\$	824.57 7,000.00 7,824.57

7th Omnibus Objection - Amended Claims Basis for Objection: See Paragraph 17

Name	Date Filed	Case Number / Debtor	Claim #	Claimed Amounts			
Remaining Claim New York State Department of Taxation & Finance	4/3/2023	Acquisition Company New York L 23-90056		Secured:	\$	-	
PO Box 5300 Albany, NY 12205		23-90056	283	Priority: Unsecured: Total:	\$ \$ \$	43,365.49 10,360.20 53,725.69	
Claim to be Disallowed				Total.	Ψ	33,723.09	
State of New Jersey Division of Taxation Bankruptcy Section	4/26/2023	IEH Auto Parts Holding LLC 23-90054		Secured: Admin:		-	
3 John Fitch Way Trenton, NJ 08695-0245			457	Priority: Unsecured:		27,117.99 -	
Claim to be Disallowed				Total:	\$	27,117.99	
State of New Jersey Division of Taxation Bankruptcy Section	7/19/2023	IEH Auto Parts Holding LLC 23-90054		Secured: Admin:		-	
3 John Fitch Way Trenton, NJ 08695-0245		23-30034	695	Priority: Unsecured:		25,000.00	
,				Total:	\$	25,000.00	
Remaining Claim State of New Jersey Division of Taxation Bankruptcy Section	3/28/2024	IEH Auto Parts Holding LLC		Secured:	\$	-	
3 John Fitch Way		23-90054	760	Admin: Priority:	\$ \$	- 6,620.00	
Trenton, NJ 08695-0245				Unsecured: Total:	<u>\$</u> \$	6,620.00	
Claim to be Disallowed				Total.	Ψ	0,020.00	
State of New Jersey Division of Taxation Bankruptcy Section	4/26/2023	IEH Auto Parts LLC 23-90057		Secured: Admin:		-	
3 John Fitch Way Trenton, NJ 08695-0245		20 00001	460	Priority: Unsecured:		68,330.14	
Henton, No 00033-0240				Total:	\$	68,330.14	
Remaining Claim State of New Jersey Division of Taxation	5/16/2024	IEH Auto Parts LLC		Secured:	\$	_	
·		23-90057		Admin:	\$	_	
3 John Fitch Way Trenton, NJ 08695-0245			764	Priority: Unsecured:	\$ \$	18,186.83 -	
				Total:	\$	18,186.83	

Reclassified Claims

7th Omnibus Objection - Reclassified Claims Basis for Objection: See Paragraphs 18-25

Name	Date Filed	Case Number / Debtor	Claim	# Cla	im As	Filed	Мос	lified (Claim	Reason for Modification
Allegiance Staffing	2/16/2023	IEH Auto Parts LLC 23-90057		Secured: Admin:	\$	-	Secured: Admin:	\$	-	Claim asserts an administrative priority for \$41,138.47 under 11 U.S.C. § 507(a)(4) (which grants priority for certain wages and benefits earned by an individual employee or independent contractor of the debtor) and \$3,724,42 under 11 U.S.C. § 507(a)(8)
5726 Root Rd Spring, TX 77389			29	Priority: Unsecured:			Unsecured:		56,660.85	(which grants priority for claims of governmental units for certain taxes). However, the claim is for services of a staffing agency and the claimant is not an individual nor a government unit. Therefore, the claim is not eligible for priority treatment under either
Edward Stolarcyk, Mike Stolarcyk	4/25/2023	IEH Auto Parts Holding LLC		Total: Secured:	\$	56,660.85	Total: Secured:	\$ \$	56,660.85	
PO Box 736 Whitney Point, NY 12862		23-90054	430	Admin: Priority: Unsecured:	UNL	IQUIDATED -	Admin: Priority: Unsecured:	UNL	- - LIQUIDATED	Claim asserts an unliquidated administrative priority under 11 U.S.C. § 507(a)(7) (which grants priority for deposits toward purchase, lease, or rental of property or services for personal, family, or household use). However, the claim is related to a commercial lease and therefore does not qualify for priority under § 507(a)(7). Thus, this claim should be reclassified to a General Unsecured Claim.
LAND LOAD WARDE ACCORDANCE INC.	0/00/0000	IEU A C B C LLO		Total:	\$	-	Total:	\$	-	
J AND J BAUMHARDT AGGREGATES INC	3/22/2023	IEH Auto Parts LLC 23-90057		Secured: Admin:	\$	-	Secured: Admin:	\$	-	Claim asserts an administrative priority for \$2,000 under 11 U.S.C. § 507(a)(7) (which grants priority for deposits toward purchase, lease, or rental of property or services for personal, family, or household use). However, the claim is for snow plowing services
W3998 HWY 45 EDEN, WI 53019			170	Priority: Unsecured:		2,000.00	Priority: Unsecured:		- 2,000.00	provided by claimant in 2021-2022, which is not a deposit and does not qualify for priority under § 507(a)(7). Thus, this claim should be reclassified to a General Unsecured Claim.
				Total:	\$	2,000.00	Total:	\$	2,000.00	
Peerless Chain Company	4/25/2023	IEH Auto Parts LLC 23-90057		Secured: Admin:	\$	- 8,137.58	Secured: Admin:	\$	-	Claim asserts an administrative priority for \$8,137.58 under 11 U.S.C. § 507(a)(2) (which grants priority for administrative expense claims allowed under 11 U.S.C. § 503(b)). The invoices attached to the proof of claim are for goods that were received more than
1416 East Sanborn St. Winona, MN 55987			442	Priority: Unsecured:		- 140,388.69	Priority: Unsecured:		- 148,526.27	20 days prior to the Petition Date and therefore not allowed as an administrative claim under 503(b)(9). The Wind-Down Debtor does not believe this claim qualifies under any other subsection of 503(b), as the invoices are all prepetition and relate to goods
				Total:	\$	148,526.27		\$	148,526.27	sold to the Debtors. Therefore, the claim is not eligible for administrative priority under § 507(a)(2).
Town and Country Building Services PO Box 7067	3/15/2023	IEH Auto Parts Holding LLC 23-90054	122	Secured: Admin:	\$ \$	-	Secured: Admin:	\$	-	Claim asserts an administrative priority for \$950 under 11 U.S.C. § 507(a)(4) (which grants priority for certain wages and benefits earned by an individual employee or independent contractor of the debtor). However, the claim is for janitorial services rendered
Lees Summit, MO 64064			122	Priority: Unsecured: Total:	\$ 	950.00 - 950.00	Unsecured:	\$	950.00 950.00	by a third party. Therefore, the claim is not eligible for priority treatment under § 507(a)(4) and should be reclassified to a Genera Unsecured Claim.

Duplicate Claim

7th Omnibus Objection - Duplicate Claim Basis for Objection: See Paragraphs 26-28

			Disallowed				Remaining Claim			
Name	Date Filed	Case Number / Debtor	Claim #	Clai	im As Filed	l	#	Rer	maining	Claim
Stacy Heins	3/17/2023	IEH Auto Parts Holding LLC		Secured:		-		Secured:		-
		23-90054		Admin:		-		Admin:		-
			140	Priority:		1,258.71	213	Priority:		1,258.71
				Unsecured:				Unsecured:		-
				Total:	\$	1,258.71		Total:	\$	1,258.71

Partially Satisfied Claims

Omnibus 7 - Partially Satisfied Claims Basis for Objection: See Paragraphs 29-31

Name	Date Filed	Case Number / Debtor	Claim	# Cla	im As	s Filed	Modif	fied (Claim	Reason for Modification
Charles Rigby	2/27/2023	IEH Auto Parts Holding LLC 23-90054	68	Secured: Admin: Priority: Unsecured: Total:	\$ 	- Secu - Admi 15,150.00 Priori 56,983.00 Unse 72,133.00 Total	n: y:	\$	- - - 56,983.00 56,983.00	Clamant was terminated prepetition and was entitled to \$72,133.00 of severance, of which \$15,150 was entitled to priority. The claimant previously received a payment on account of their severance in the amount of \$5,961.54. The the Wind-Down Debtor is paying the the difference of \$9,188.46 contemporaneously with the filing of this objection satisfying the priority amount of this claim. The Wind-Down Debtor requests that the priority amount be reduced to \$0.
Garrison, Ephraim S	5/2/2023	Auto Plus Auto Sales LLC 23-90055	608	Secured: Admin: Priority: Unsecured: Total:	\$ \$	- Secu - Admi 15,150.00 Priori 57,879.00 Unse 73,029.00 Total	n: y:	\$	- - - 57,879.00 57,879.00	Claimant was terminated postpetiton and was entitled to \$70,092.60 in severance payments. The claimant previously received a payment on account of their severance in the amount of \$64,370.75. The the Wind-Down Debtor is paying the the difference of \$5,721.85 contemporaneously with the filing of this objection satisfying the priority amount of this claim. The Wind-Down Debtor requests that the priority amount be reduced to \$0.
Insight Global, LLC PO Box 11569 Atlanta, GA 30355	3/27/2023	Auto Plus Auto Sales LLC 23-90055	249	Secured: Admin: Priority: Unsecured: Total:	\$	- Secu - Admi 13,470.75 Priori 52,776.79 Unse 66,247.54 Total	n: y: cured:	\$	3,906.34 52,776.79 56,683.13	The Debtors paid \$9,564.41 via ACH to claimant on April 6, 2023 in the ordinary course of business. As such, the Wind-Down Debtor believes the administrative priority amount should be reduced to reflect such payment.
Jason R. Warner	5/5/2023	IEH Auto Parts Holding LLC 23-90054	616	Secured: Admin: Priority: Unsecured: Total:	\$ 	- Secu - Admi 15,150.00 Priori 1,785.41 Unse 16,935.41 Total	n: y:	\$	- - - 1,785.41 1,785.41	Claimant was terminated postpetiton and was entitled to \$30,060.00 in severance payments. The claimant previously received a payment on account of their severance in the amount of \$26,052.00. The the Wind-Down Debtor is paying the the difference of \$4,008.00 contemporaneously with the filing of this objection satisfying the priority amount of this claim. The Wind-Down Debtor requests that the priority amount be reduced to \$0.
Life Insurance Company of North Ameri 51 Madison Avenue New York, NY 10010	ca 4/26/2023	IEH Auto Parts LLC 23-90057	471	Secured: Admin: Priority: Unsecured: Total:	\$ 	- Secu 196,272.35 Admi 111,644.00 Priori 123,120.60 Unse 431,036.95 Total	n: y:	\$	- - 123,120.60 123,120.60	This proof of claim has been satisfied through various payments in 2023 and 2024, with final payment being made in March of 2024. The Reviewing Parties reached out to claimant's counsel who confirmed all administrative and priority claims have been paid.
Rhode Island Division of Taxation 1 Capitol Hill Providence, RI 02908	7/3/2023	IEH Auto Parts LLC 23-90057	673	Secured: Admin: Priority: Unsecured: Total:	\$	- Secu - Admi 3,119.35 Priori 700.00 Unse 3,819.35 Total	n: y: cured:	\$	- - 700.00 700.00	The filed claim is an estimated amount. The actual tax liability is \$3,796 based on correspondence with the taxing authority. The actual tax liability was paid prior to the Petition Date. As such, the priority amount should be reduced to \$0.
State of Florida - Department of Revenue PO Box 6668 Tallahassee, FL 32314	ue 2/21/2023	IEH Auto Parts LLC 23-90057	34	Secured: Admin: Priority: Unsecured: Total:	\$	- Secu - Admi 3,433,049.37 Priori 631,482.00 Unse 4,064,531.37 Total	n: y: cured:	\$	- - - 631,482.00 631,482.00	The filed claim is an estimated amount. The actual tax liability is \$1,207,061.74 based on correspondence with the taxing authority. The Debtors paid \$1,207,061.74 on 3/30/2023 in accordance with the Tax Order. As such, the priority amount should be reduced to \$0.